

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JAVIER TAPIA,
Plaintiff

v.

MICHAEL RAO, et al.
Defendants

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Case No.: 3:18CV00899

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff, Javier Tapia, by counsel, respectfully requests that the Court enter a preliminary injunction to restore the *status quo ante* until a judgment on the merits of Plaintiff's claims is entered by enjoining the Defendants from continuing their constitutional violations during the pendency of this litigation.

A preliminary injunction is warranted here because Professor Tapia is likely to succeed on the merits, will suffer irreparable harm in the absence of such relief, and because the balance of the equities and public interest weigh in favor of granting such relief. Plaintiff refers the Court to the accompanying Memorandum in Support of Plaintiff's Motion for a Preliminary Injunction for additional support for this motion. For the reasons contained therein, the Plaintiff respectfully requests that his Motion for a Preliminary Injunction be granted.

Respectfully submitted,
JAVIER TAPIA
By Counsel

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of May, 2019, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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